IN THE UNITED STATES DISTRICT COURT NORTHERN DISTRICT OHIO EASTERN DIVISION

UNITED STATES OF AMERICA * CASE NO. 5:20CV434

Plaintiff *

-vs- * JUDGE BENITA Y. PEARSON

\$350,050.00 IN U.S. CURRENCY SEIZED * ON OCTOBER 30, 2019, et al.

ANSWER AND DEFENSES OF CLAIMANT CORY GRANDISON

*

Now comes the Claimant, Cory Grandison, an interested party herein, who for his answer

and defenses to the allegations of Plaintiff, states:

1. Admits the allegations contained in paragraphs 1, 2, 3 and 4;

- 2. Admits the commencement of an administrative forfeiture proceeding and that a claim was submitted. Claimant denies the remaining allegations in paragraph 5;
- 3. Denies the allegations contained in paragraph 6;
- 4. Admits the allegations contained in paragraphs 7 and 8;
- 5. Denies the allegations contained in paragraph 9;
- 6. Is without sufficient knowledge and information or belief to admit or deny the allegations in paragraph 10 and therefore denies said allegations;
- 7. Admits the allegations contained in paragraphs 11, 12 and 13;
- 8. Denies the allegations contained in paragraph 14;

DEFENSES

 Claimant asserts a valid legal claim to the Defendant property set forth in Plaintiff's Complaint. Claimant's verified claim was filed on March 12, 2020 (Doc. #11, PageID #30-31). Said claims are again asserted here and adopted here as if fully rewritten;

10. Claimant reserves the right to raise any affirmative defense as may become apparent through discovery or through course of this case;

WHEREFORE, Claimant Grandison having fully answered each claim herein, asks that this Court dismiss Plaintiff's Complaint, deny the forfeiture and order all property returned to Claimant and for such other relief as the Court may deem proper.

Respectfully submitted,

/S/ THOMAS M. BAUER, JR.

THOMAS M. BAUER, JR. #0073432 Attorney for Claimant 137 South Main Street, Suite 201 Akron, Ohio 44308 330-253-7171 330-253-7174 (fax) burdon-merlitti@neo.rr.com

PROOF OF SERVICE

I hereby certify that on April 1, 2020, the foregoing Answer and Defenses of Claimant Cory Grandison was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/S/ THOMAS M. BAUER, JR.
THOMAS M. BAUER, JR.
Attorney for Claimant